

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF TENNESSEE
KNOXVILLE DIVISION

In Re:

Case No. 3:19-bk-31280-SHB

TERRY BERNARD BLACK
YOLANDA DENISE BLACK,
DEBTOR(S).

Chapter 13

**OBJECTION OF OCWEN LOAN SERVICING, LLC AS SERVICER FOR WELLS FARGO BANK, N.A.,
AS TRUSTEE FOR PARK PLACE SECURITIES, INC. ASSET-BACKED PASS-THROUGH
CERTIFICATES SERIES 2004-WHQ2 TO CONFIRMATION REGARDING REAL PROPERTY
LOCATED AT 4501 GREEDALE ROAD, KNOXVILLE, TENNESSEE 37918**

Comes now Ocwen Loan Servicing, LLC as servicer for WELLS FARGO BANK, N.A., as Trustee for Park Place Securities, Inc. Asset-Backed Pass-Through Certificates Series 2004-WHQ2 ("Ocwen"), for just cause, and files this written objection to confirmation pursuant to 11 USC § 1324. Ocwen objects and asks that a hearing be held, and for grounds says that Debtors' plan proposes no payments to be made through the Chapter 13 Plan by either the Debtor nor Trustee. Ocwen's claim is a security interest in real property that is the Debtor's principal residence. Therefore, Debtors' proposed plan is in violation of 11 USC § 1322(b)(2), as they attempt to modify the rights of a holder of a secured claim on their principal residence.

WHEREFORE, PREMISES CONSIDERED, Creditor prays:

1. That confirmation be denied.
2. That Ocwen be awarded its attorney fees and costs incurred in this action.
3. For any and all further relief to which it may be entitled.

Respectfully submitted,

/s/ Michael G. Clifford
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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the foregoing Objection to Confirmation has been electronically served or mailed, postage prepaid on May 2, 2019

(Served via Electronic Notification Only)

John P. Newton, Jr.

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(Served via Electronic Notification Only)

Gwendolyn M. Kerney

Chapter 13 Trustee
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Knoxville, TN 37901

Respectfully Submitted,

/s/ Michael G. Clifford

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